

PEC
WSU

California - Central Valley Regional Water Quality Control Board
11020 Sun Center Drive #200, Rancho Cordova, California 95670-6114

Subject: Support for the Rubicon Trail Cleanup and Abatement Order

I have personally viewed many part of the Rubicon Trail and would like to comment on the Order.

I am writing to express my support for the draft Cleanup and Abatement Order issued on January 23, 2009 by the Central Valley Regional Water Quality Control Board to the Eldorado County Department of Transportation. I am concerned about the destructive and unchecked off-road vehicle use resulting in ongoing resource damage on the Rubicon Trail. The Board must act to stop increased erosion, soil compaction, and damage to plants and animals. I support the Regional Board's effort to prevent this situation from worsening even further and believe that such actions are long overdue.

If adopted, the order would be a positive first step in addressing the off-road vehicle use that is degrading water quality in the area and threatening both human and environmental health, including the destruction of rare riparian habitat. A move to prevent these impact is especially important because the lands surrounding the Rubicon include many national forest lands -- lands that belong to the public and make up our national heritage. These areas are being irreparably damaged by off-roaders who refuse to stay on the trail and the failure of the Forest Service to implement and enforce strong regulations.

The Rubicon's fragile riparian ecosystem can't withstand giant tires and endless trampling. Off-road vehicles cause soil erosion and sedimentation by grinding up the surface soil, leaving behind deep ruts in the trail and creating new, unauthorized vehicle routes into the forest. Off-road vehicle use and the accompanying litter and debris impair drinking water and disturb sensitive wildlife including the Pacific fisher, mountain yellow-legged frog, and northern goshawk.

I support the adoption of the Order and ask that its adoption be complemented by closure of the Rubicon Trail until such time as a full environmental review can be conducted and appropriate measures are taken to minimize impacts from future motorized use of the trail, if such use must occur. Even if the Regional Board determines that complete trail closure is not necessary at this time, at minimum the trail should be closed to all wet season use and any ongoing use should be limited to street legal vehicles in order to minimize erosion and subsequent waterway sedimentation. Wet season use of these fragile areas is particularly damaging and contributes heavily to the sediment discharge and non-street-legal vehicles tend to cause greater damage than street legal vehicles. These important interim measures will have immediate and noticeable benefits to the ecosystem and the water quality.

Off-road groups argue that they can police themselves and that a formal order is unnecessary because the environmental impacts of off-road vehicles can be mitigated by volunteer efforts. Efforts by volunteers to pick up their own trash are well-intentioned; however, these efforts cannot solve the problems caused by inappropriate use. Furthermore, self-policing and volunteer efforts have proven largely ineffective in preventing environmental damage and illegal behavior.

I commend the Regional Board and staff for your excellent assessment of the impacts on the Rubicon from off-road vehicle use and initiating the process needed to stop this damage from continuing. I also applaud you for finally taking action -- action that is long overdue -- and ask that the draft Cleanup and Abatement Order be formally adopted.



Cheryl Beyer
PO Box
South Lake Tahoe, CA 96151